Attachment Thirteen

IN THE UNITED STATES DISTRICT COURT DEC 1 2 2005

FOR THE EASTERN DISTRICT OF VIRGINIA

CLERK, U.S. DISTRICT COURT
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

Count 1: 18 U.S.C. 2071(b)

(Removal of U.S. Documents)

DONALD W. KEYSER

Counts 2 - 3: 18 U.S.C. 1001(a)

(False Official Statements)

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

From in or about 1992 until on or about September 4, 2004, in Fairfax County, Virginia, within the Eastern District of Virginia and in the District of Columbia, the defendant, Donald W. Keyser, having custody of classified United States documents and papers in a public office, that is, the United States Department of State, willfully and unlawfully removed classified documents and papers from the Department of State to his residence in Fairfax County, Virginia.

(In violation of Title 18, United States Code, Section 2071(b))

COUNT TWO

On or about September 7, 2003, at Dulles International Airport, in Loudoun County, in the Eastern District of Virginia, defendant DONALD WILLIS KEYSER did knowingly, willfully, and unlawfully make material false, fictitious, and fraudulent statements and representations, and conceal material facts, in a matter within the jurisdiction of an agency within the executive branch of the Government of the United States; to wit, on or about the above date, KEYSER transmitted a Customs Declaration form upon his return to the United States from overseas to an official of the U.S. Department of Homeland Security, on which form he falsely stated, in response to an item on the form requiring the traveler to identify the "[c]ountries visited on this trip prior to U.S. arrival," that he had visited only China and Japan, when, in fact, KEYSER had also visited Taiwan.

(In violation of Title 18, United States Code, Section 1001(a))

COUNT THREE

On or about August 9, 2004, in Arlington, Virginia, in the Eastern District of Virginia, the defendant DONALD WILLIS KEYSER did knowingly, willfully, and unlawfully make material false, fictitious, and fraudulent statements and representations, and conceal material facts, in a matter within the jurisdiction of an agency within the executive branch of the Government of the United States; to wit, on or about the above date, KEYSER falsely stated to an investigator of the Bureau of Diplomatic Security of the U.S. Department of State at the Foreign Service Institute in Arlington, Virginia, in an interview relating to KEYSER's security reinvestigation, that he had not engaged in conduct which may make him vulnerable to coercion, exploitation, or pressure from a foreign government.

(In violation of Title 18, United States Code, Section 1001(a))

Respectfully submitted,

PAUL J. McNULTY
UNITED STATES ATTORNEY

By:

Patricia M. Haynes

David H. Laufman

Assistant United States Attorneys

COUNT THREE

On or about August 9, 2004, in Arlington, Virginia, in the Eastern District of Virginia, the defendant DONALD WILLIS KEYSER did knowingly, willfully, and unlawfully make material false, fictitious, and fraudulent statements and representations, and conceal material facts, in a matter within the jurisdiction of an agency within the executive branch of the Government of the United States; to wit, on or about the above date, KEYSER falsely stated to an investigator of the Bureau of Diplomatic Security of the U.S. Department of State at the Foreign Service Institute in Arlington, Virginia, in an interview relating to KEYSER's security reinvestigation, that he had not engaged in conduct which may make him vulnerable to coercion, exploitation, or pressure from a foreign government.

(In violation of Title 18, United States Code, Section 1001(a))

Respectfully submitted,

PAUL J. McNULTY
UNITED STATES ATTORNEY

By:

Patricia M. Haynes

David H. Laufman

Assistant United States Attorneys

A TRUE COPY, TESTE: CLERK, U.S. DISTRICT COURT

DEPUTY CLERK